

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

RYAN WALTERS, Oklahoma
Superintendent of Public Instruction, *et al.*,

Plaintiffs,

v.

KRISTI NOEM, Secretary of Homeland
Security, *et al.*,

Defendants.

CIV-25-0056-JD

**JOINT MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO THE COMPLAINT**

Ryan Walters, Superintendent of Public Instruction, and the Oklahoma State Department of Education (“Plaintiffs”), along with Defendants Kristi Noem, Secretary of Homeland Security, the United States Department of Homeland Security, and various other named officials and components thereof, (“Defendants” and, together with Plaintiffs, the “Parties”) hereby move this Court for a 60-day extension of time in which the Defendants may answer or otherwise respond to the Complaint, ECF No. 1. In support of this Motion, and pursuant to LCvR 6.3 the parties state as follows:

1. Due date without the requested extension:

The Parties respectfully ask the Court to extend the deadline to answer or otherwise respond to the Complaint by 60 days. The current deadline is March 24, 2025—60 days from the date the Complaint was served on the United States Attorney’s Office. *See* Fed. R. Civ. P. 12(a)(2). If the Court grants the requested extension, the new deadline will be May 23, 2025.

2. Whether previous extension motions have been made and the disposition of such motions:

No extensions have been previously requested of the deadline to answer or otherwise respond. Nor have any other extensions been requested in this case.

3. Specific reasons for the requested extension:

The parties respectfully submit that good cause exists for the requested extension under Fed. R. Civ. P. 6(b). Since the filing of the Complaint, counsel for the Parties have met and conferred on several occasions in order to explore whether this case can be resolved without the need for Court intervention. The Parties believe that it is in the interests of judicial economy to postpone the deadline to answer or otherwise respond so that they can continue to explore the possibility of resolving the case without further litigation. Defendant thus has not yet prepared a response under Rule 12. If the Parties' discussions are successful, it would avoid the need to file such a response, engage in any motion practice, or otherwise devote judicial resources to resolving this case. The parties believe that sixty additional days will allow sufficient time to decide whether such a resolution is possible.

4. Whether the opposing counsel or party agrees or objects to the requested extension:

This is a joint motion submitted by the Parties who all agree that there is good cause for the requested extension.

5. The impact, if any, on the scheduled trial or other deadlines:

If the requested extension is granted, the new deadline to answer or otherwise respond to the Complaint will be May 23, 2025. There will be no impact on any scheduled trial, since none is scheduled, and no other deadlines will be affected.

6. The precise relief requested by the motion:

For the reasons discussed above, the parties jointly request the Court extend the deadline to answer or otherwise respond to the Complaint by 60 days, to May 23, 2025.

This is a LCvR 7.1(j)(1) motion, and no brief is required. A proposed order incorporating the proposed deadlines will be submitted separately pursuant to LCvR 6.3 and the Court's ECF Policies & Procedures Manual.

Dated: March 17, 2025

Respectfully submitted,

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/s/ Peter M. Bryce
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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2025, the foregoing was electronically filed with the clerk of the court by using the CM/ECF system.

s/Peter M. Bryce

Senior Trial Counsel
Federal Programs Branch
Civil Division
Department of Justice